

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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2005 MAY 12 AM 10:44

WILLIAM J. EDWARDS,
Plaintiff

V.

THE ORIGINAL FOOTWEAR COMPANY,
Defendant

Civil Action
No. 04-12593-RGS

JOINT STATEMENT PURSUANT TO RULE 16.1(D)

The parties submit the following Joint Statement pursuant to United States District Court Local Rule 16.1(D).

(1) **Discovery**

A. Disclosures Under Fed. R. Civ. P. 26(a)

The parties do not propose any changes to the disclosure requirements of Fed. R. Civ. P. 26(a), except as set forth below with respect to any disclosures of expert testimony. The parties will make their Initial Disclosures required by Fed. R. Civ. P. 26(a)(1) no later than May 31, 2005.

B. Discovery Plan

1. Subjects for Discovery

The parties anticipate taking discovery with respect to both liability and damages issues. In addition to discovery between the parties, this case is likely to require document and deposition discovery from non-party witnesses located in Connecticut, New York, and California.

2. Completion of Discovery

The parties agree to complete discovery by February 17, 2006. Disclosures of expert testimony under Fed. R. Civ. P. 26(A)(2), if any, shall be made no later than January 13, 2006.

3. Limitations on Discovery

The parties agree to the limitations imposed by L.R. 26.1(C).

4. Orders Concerning Discovery

The parties do not require any discovery orders at this time.

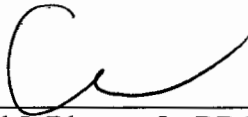
(2) Motions

The parties agree that any motions for summary judgment will be filed no later than March 17, 2006. The parties request that Oppositions to summary judgment motions be due thirty (30) days after service of such a motion.

(3) Certifications

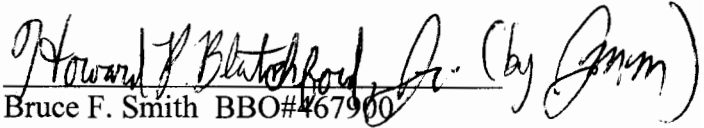
Counsel will file the required Certifications signed by them and their clients at the time of the Scheduling Conference.

WILLIAM J. EDWARDS
By his attorneys,



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THE ORIGINAL FOOTWEAR CO.
By its attorneys,



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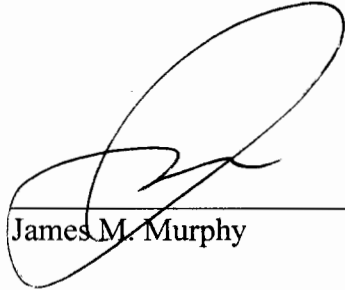
Dated: May 11, 2005

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the above documents on all parties to this action by first class mail.

Date:

5/11/05



James M. Murphy